

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PATRICK BRADY, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 02-2917 (JEI)
)	
AIR LINE PILOTS ASSOCIATION,)	
)	
)	
Defendant.)	
)	

**PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION TO REVOKE THE PRO HAC VICE
ADMISSION OF COUNSEL**

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Dated: September 12, 2011

Defendant (“ALPA”) has moved to revoke the *pro hac vice* admissions of Allen Press and Joe Jacobson. Plaintiffs oppose ALPA’s motion for the simple reason that none of the allegations asserted are true. Plaintiffs’ witnesses did not lie, and Press and Jacobson did not coach them to lie. *See* the Declarations of Allen Press and Joe Jacobson attached hereto as Exhibits A and B.

Plaintiffs filed a motion for sanctions under Rule 11 as their initial response, and they further oppose ALPA’s motion for all the reasons stated in their Rule 11 motion. Plaintiffs incorporate that motion as if fully set forth herein. *See* Doc. No. 443

ALPA’s motion to revoke Press and Jacobson’s *pro hac vice* admissions is frivolous. The motion should be denied, and because there is no basis to have made such allegations, ALPA’s counsel should be sanctioned.

Finally, plaintiffs respectfully request that the Court decide the pending motion without delay. As detailed in Joe Jacobson’s declaration, he has been nominated for a seat on the Missouri Supreme Court. Any unresolved allegation of misconduct against him may affect whether he is appointed. The time period within which the Governor must make the appointment is short, and therefore plaintiffs respectfully request the Court act promptly on this matter.

Dated: September 12, 2011

Respectfully submitted,

TRUJILLO RODRIGUEZ & RICHARDS, LLC

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